

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

NICOLE HARRIS,)	
Plaintiff,)	
v.)	No. 14-cv-4391
)	Judge John W. Darrah
CITY OF CHICAGO, <i>et al.</i>)	
)	
Defendants.)	

**TABLE OF CONTENTS TO EXHIBITS IN SUPPORT OF
PLAINTIFF’S LOCAL RULE 56.1(b)(3)(C) STATEMENT
OF ADDITIONAL FACTS REQUIRING DENIAL OF
THE CITY’S MOTION FOR PARTIAL SUMMARY JUDGMENT**

<u>No.</u>	<u>Exhibit</u>
Exh 1	May 15, 2005 General Progress Report (“GPR”) of Diante Dancy Interview, by Defendant Wo, CITY1218-129.
Exh. 1a	May 15, 2005 GPR re: Diante Interview, by Defendant Wo with the Word “ DRAFT ” marked across the face of the document, CITY1220-21.
Exh. 2	May 16, 2005 Interview Note by DCFS Child Protection Investigator Karen Wilson, DCFS36.
Exh. 3	Transcript Excerpts of April 11, 2006 and April 15, 2006 interviews of Diante Dancy, conducted by Dr. Robert Galatzer-Levy.
Exh. 4	May 14, 2005 Field Investigation Report, by Officer Hector Lopez, CITY394-95.
Exh. 5	Deposition Excerpts of Defendant John Day.
Exh. 6	Deposition Excerpts of Plaintiff Nicole Harris.
Exh. 7	Deposition Excerpts of Sta-Von Dancy.
Exh. 8	May 14, 2005 GPR, by Defendant Wo, CITY414-15.
Exh. 9	Detective Division Standard Operating Procedures, Excerpts, CITY160, 246.
Exh. 10	Expert Report of Plaintiff’s Expert Gregg McCrary.
Exh. 11	City’s Response to Plaintiff’s First Set of RTAs – Resp. No. 3.

- Exh. 12 Deposition Excerpts of Defendant Demosthenes Balodimas.
- Exh. 13 Deposition Excerpts of Defendant Randall Wo.
- Exh. 14 May 15, 2005 GPR of “First Confession,” by Defendant Landando, CITY399.
- Exh. 15 May 15, 2005 GPR of “Recantation,” by Defendant Noradin, CITY421.
- Exh. 16 Deposition Excerpts of Defendant Anthony Noradin.
- Exh. 17 Expert Report of Plaintiff’s Expert Charles Honts.
- Exh. 18 May 14, 2005 GPR, by Defendant Kelly, CITY412-413.
- Exh. 19 Deposition Excerpts of Defendant James Kelly.
- Exh. 20 Deposition Excerpts of Defendant Robert Cordaro.
- Exh. 21 June 21, 2005 Cleared & Closed Supplementary Report, by Defendants Wo, Day, Noradin, and Balodimas.
- Exh. 22 City’s Second Supplemental Amended Response to Plaintiff’s Third Set of Requests to Admit.
- Exh. 23 June 17, 2013 Circuit Court of Cook County Proceedings, PL Nicole Harris 5141-46.
- Exh. 24 Nicole Harris’s Certificate of Innocence, PL Nicole Harris 9677.
- Exh. 25 Group Exhibit: CPD procedures for the Polygraph Unit: CITY1455-61, 1447-50, 8551-58, 8559-66.
- Exh. 26 Deposition Excerpts of City’s 30(b)(6) Deponent James Hickey.
- Exh. 27 Nov. 10, 2015 Statements to the Court by City’s lead attorney John Gibbons
- Exh. 28 City’s Verified Third Resp. to Plaintiff’s First Set of Interrogatories – Resp. No. 4.
- Exh. 29 Expert Report of Plaintiff’s Expert Richard Leo.
- Exh. 30 Deposition Excerpts of Defendant Robert Bartik.
- Exh. 31 Deposition Excerpts of Defendant Robert Bartik from *McGee v. City of Chicago*, N.D. Ill. Case No. 04 CV 6352.
- Exh. 32 Deposition Excerpts of City’s 30(b)(6) Deponent Donald O’Neill.

- Exh. 33 Group Exhibit: Bartik performance reviews, CITY8099-8109.
- Exh. 34 Plaintiff's summary chart regarding CPD's scattered locations of records of officers' performance.
- Exh. 35 March 10, 2013 *Chicago Tribune* article regarding issues with the Polygraph Unit.
- Exh. 36 City's Responses to Plaintiff's Amended Third Set of Requests to Admit.
- Exh. 37 City's Verified Response to Plaintiff's Second Set of Interrogatories – Resp. No. 1.
- Exh. 38 Plaintiff's chart of 42 cases in which CPD obtained a “confession” that was later proven to be false and/or fabricated and for which defendant was fully exonerated.
- Exh. 39 Harris's April 29, 2015 Response to City's Second Set of Interrogatories – No. 1.
- Exh. 40 City's Supplemental Response to Amended Second Set Requests to Admit.
- Exh. 41 Sept. 28, 1990 Goldston and Sanders' Office of Professional Standards Investigative Report.
- Exh. 42 December 9, 2015 Mayor Rahm Emanuel Address to City Council.
- Exh. 43 December 8, 2015 Mayor Rahm Emanuel Interview on WTTW's *Chicago Tonight* (available at <http://chicagotonight.wttw.com/2015/12/08/mayor-emanuel-police-reform-accountability>, last visited 3/14/16) (copyright-protected CD to Court only).
- Exh. 44 2001 CPD Annual Report.
- Exh. 45 2002 CPD Annual Report.
- Exh. 46 2003 CPD Annual Report.
- Exh. 47 2004 CPD Annual Report.
- Exh. 48 2005 CPD Annual Report.
- Exh. 49 Deposition Excerpts of Defendant Michael Landando
- Exh. 50 December 2001 *Chicago Tribune* series of articles entitled Cops and Confessions.
- Exh. A UNDER SEAL List of individuals from whom Bartik claims to have obtained 144 pre-test confessions, DEF911.